

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)
)
)
v.)
)
GLEN CASADA and)
CADE COTHREN)
)
Defendants.)

Case No. 3:22-CR-00282

District Judge Eli J. Richardson

**DEFENDANTS' JOINT MOTION TO COMPEL DISCLOSURE
OF IDENTITIES OF GOVERNMENT'S CONFIDENTIAL SOURCES**

Come now Defendants Glen Casada and Cade Cothren, by and through undersigned counsel, and move this Court to compel the government to disclose the identities of the Confidential Human Sources ("CHSes"), including those identified in discovery documents as CHSes 1, 2, and 3, and the CHSes who participated in the recorded statements of and/or about Defendants and their alleged co-conspirator, Robin Smith, produced by the government in discovery.

In support of this Motion, Defendants are filing a memorandum of law contemporaneously herewith.

CERTIFICATE OF COMPLIANCE

Undersigned counsel hereby certifies that, via correspondence on February 4, February 10, and February 18, counsel for Mr. Cothren conferred with counsel for the United States in a good-faith effort to resolve by agreement the subject matter of this Motion and was unable to reach an agreement.

Respectfully Submitted,

Sherwood Boutique Litigation, PLC

/s/ Cynthia A. Sherwood
Cynthia A. Sherwood, #20911
Austin M. Correll, #39561
414 Union Street
Suite 1110
Nashville, TN 37219
T: 615-873-5670
F: 615-900-2312
cynthia@sherwoodlitigation.com
austin@sherwoodlitigation.com
Counsel for Defendant Cade Cothren

Barnes & Thornburg LLP

/s/ Joy Boyd Longnecker
Joy Boyd Longnecker, #29627
1600 West End Avenue
Suite 800
Nashville, TN 37203
T: 615-621-6012
joy.longnecker@btlaw.com
Counsel for Defendant Cade Cothren

Spencer Fane LLP

/s/ Jonathan P. Farmer
Edward M. Yarbrough
Jonathan P. Farmer
Steven C. Fann
Spencer Fane LLP
511 Union Street
Suite 1000
Nashville, TN 37219
eyarbrough@spencerfane.com
jfarmer@spencerfane.com
cfann@spencerfane.com
Counsel for Defendant Glen Casada

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on February 25, 2025, and service was made upon the following via CM/ECF and/or by email.

Edward M. Yarbrough
Jonathan P. Farmer
Steven C. Fann
Spencer Fane LLP
511 Union Street
Suite 1000
Nashville, TN 37219

eyarbrough@spencerfane.com
jfarmer@spencerfane.com
cfann@spencerfane.com

John P. Taddei
Blake J. Ellison
U.S. Department of Justice
Public Integrity Section
1301 New York Ave. NW
Ste 10th Floor
Washington, DC 20530
john.taddei@usdoj.gov
blake.ellison@usdoj.gov

Taylor J. Phillips
U.S. Attorney's Office
719 Church Street
Suite 3300
Nashville, TN 37203
taylor.phillips@usdoj.gov

W. David Bridgers
L. Wells Trompeter
Holland & Knight LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
david.bridgers@hklaw.com
wells.trompeter@hklaw.com

Ben M. Rose
RoseFirm, PLLC
Post Office Box 1108
Brentwood, Tennessee 37024
ben@rosefirm.com

/s/ Cynthia A. Sherwood